

**Hearing Date and Time: TBD**  
**Response Date: September 8, 2016**

Frank Reed  
817 Matlack Drive  
Moorestown, NJ 08057  
Telephone: (856) 956-6950  
*Creditor, Pro Se*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	Case No. 12-12020 (MG)
	)	
RESIDENTIAL CAPITAL LLC, et al.,	)	Chapter 11
	)	
Debtors.	)	Jointly Administered
	)	
	)	
	)	

**STATEMENT OF CLAIMANT FRANK J. REED III WITH RESPECT TO  
RESCAP BORROWER CLAIMS TRUST’S MOTION *IN LIMINE* TO  
EXCLUDE EVIDENCE “CONCERNING CLAIMANT’S EXPERT  
WITNESS FEES AS DAMAGES”**

TO THE HONORABLE MARTIN GLENN  
UNITED STATES BANKRUPTCY JUDGE:

Claimant Frank Reed (“Reed”) hereby submits this statement with respect to the motion *in limine* filed by The ResCap Borrower Claims Trust (“ResCap”), by which ResCap seeks to exclude evidence concerning expert witness fees as damages. See ResCap’s Motion [ECF Doc. # 10039]. With respect ResCap’s motion, Reed respectfully states as follows:

1. Upon my research and review of the issues raised by ResCap in this motion regarding whether recovery of expert fees is allowed under New Jersey’s Consumer Fraud Act, I concur that same is not recoverable and I do not wish to consume the Court’s time and resources with adversarial motion practice on this issue.

Dated: Moorestown, New Jersey  
September 8, 2016

Respectfully Submitted,

By: \_\_\_\_\_  
Frank Reed, *pro se*